

WRAL-TV
Raleigh, North Carolina
POLITICAL ADVERTISING DISCLOSURE STATEMENT
August 2012

The purpose of this Disclosure Statement is to make those parties who purchase political advertising and programming time fully aware of WRAL-TV's political advertising policies and procedures including application of the "lowest unit charge" provisions of Section 315(b) of the Communications Act, as amended (the "Act"), and the sponsorship identification provisions found in Section 317 of the Act and Section 441d of the Federal Election Campaign Act.

Orders for Political Time

Orders for political time will not be considered firm until the appropriate certifications and purchase request forms (see attached) are delivered to the station. Net payment for the air schedule must be received prior to when the order is scheduled to be entered into the station's traffic system (see Log Deadlines). The station does accept advertisements during network and local news programming.

Acceptable Forms of Payment

Acceptable forms of payment include cash, check and direct bank transfer. WRAL-TV does not accept payment by credit or debit cards.

Lowest Unit Charge

During the 45 days preceding a primary or run-off election and the 60 days preceding a general or special election (the "Election Periods"), candidates are entitled to receive all discount privileges otherwise offered to commercial advertisers and are to be placed on a par with the most favored commercial advertiser of this station. That is, during the Election Period, candidates will be charged the "lowest unit charge" (the "LUC") for the same class and amount of time for the same period. At times other than the Election Periods (the "Comparable Rate Period"), candidates may purchase time at rates comparable to those charged commercial advertisers.

The lowest unit charge provisions apply only during Election Periods to "legally qualified" candidates for public office or their authorized campaign organizations to promote their candidacy; they are not applicable to political action committees nor to non-candidate issue advertising. When requested, satisfactory proof must be provided to the station that the candidate is "legally qualified," as that term is defined by the Federal Communications Commission and/or that the purchaser is authorized to buy time for the candidate.

At times other than the prescribed Election Periods, the rates charged candidates shall not exceed the charges made for comparable uses of the station by other advertisers. The General Election Period is from September 7, 2012 to November 6, 2012.

In the event we determine after the fact that a legally qualified candidate has been sold advertising at a rate higher than our LUC in that class of time, we shall provide appropriate refunds or credits as promptly as possible.

Federal Candidate Eligibility for Lowest Unit Charge and Certification

To qualify for the station's LUC for the same class and amount of time for the same period, federal candidates, or their authorized committees, must certify in writing, at the time programming is purchased that the programming does not refer to another candidate for the same office, or if the programming does refer to an opposing candidate, that the programming meets the following requirements outlined below.

The end of the television broadcast must include, for a minimum of four seconds, a clearly identifiable photographic or similar image of the sponsoring candidate while simultaneously airing a clearly discernible statement. The statement must identify the candidate, state that the candidate approved the broadcast and that the candidate and/or the candidate's authorized committee paid for the broadcast.

The printed statement must appear in letters equal to or greater than four (4%) percent of the vertical picture height for a period of at least four (4) seconds with a reasonable degree of color contrast between the background and the printed statement.

Failure to adhere to these sponsorship identification disclosures subjects the candidate to forfeiture of all rights to the LUC for all programming aired during the remainder of the Election Period.

Proper Sponsor Identification – Federal Candidate Authorized Advertisements

Political programming that advocates the election or defeat of a federal candidate or that solicits any political contributions and that is authorized by the candidate or his authorized committee, regardless of whether or not it refers to another candidate for the same office, must comply with the following sponsorship identification rules:

Television advertisements must identify the candidate on whose behalf time was purchased, state that the candidate approved the broadcast, and state that the broadcast has been paid for by the candidate and/or the candidate's authorized committee. This can be achieved by one of two ways:

1. The candidate making the statement in an unobscured, full screen view; or
2. A candidate voice-over, accompanied by a clearly identifiable photograph or similar image of the candidate.

There must also be a written presentation of the same statement at the end of the political programming in a clearly readable manner. The statement must appear in letters equal to or greater than four (4%) percent of the vertical picture height for a period of at least four (4) seconds with a reasonable degree of color contrast between the background and the printed statement. This means the visual ID constitutes at least four percent of the vertical picture height and airs for at least four seconds, set against a background that does not reduce the statement's legibility.

Proper Sponsor Identification – Third Party/Issue Advertisements

Political programming which advocates the election or defeat of a candidate or that solicits any political contributions, but is not authorized by a candidate or his authorized committee, must: 1) state that the programming is not authorized by any candidate; 2) clearly state the full name and permanent street address, telephone number or World Wide Web address of the person who paid for the communication; and 2) include the aural statement: “_____ is responsible for the content of this

advertising.” The blank must be filled in with the name of the political committee or other person paying for the communication and the name of any connected organization, of the payor.

For television, the above statement must be made in a voice-over and shall also appear in a clearly readable manner at the end of the communication. The visual statement must appear in letters equal to or greater than four (4%) percent of the vertical picture height for a period of at least four (4) seconds with a reasonable degree of color contrast between the background and the printed statement to allow for the statement’s legibility.

Proper Sponsor Identification – Nonfederal Candidates

All advertisements must comply with the sponsorship identification requirements of the Communications Act. The identification must state that the broadcast is “sponsored, paid for or furnished by” the identified sponsor.

For state and local candidates, the statement must appear in letters equal to or greater than four (4%) percent of the vertical picture height for a period of at least four (4) seconds with a reasonable degree of color contrast between the background and the printed statement. This means the visual ID constitutes at least four percent of the vertical picture height and airs for at least four seconds, set against a background that does not reduce the statement's legibility.

A pre-airing submission of all ads is requested to permit the station to verify compliance with the identification requirements. Should a state or local candidate’s spot not be submitted in sufficient time for a pre-airing review or not contain the proper identification, the station reserves the right to reject the ad.

Type of Rates Offered by the Station

This station sells commercial time in thirty (30) second increments throughout the day. The rates for sixty (60) and ninety (90) second spots are, respectively, two (2) and three (3) times the thirty (30) second rate. Ten (10) second increments are fifty percent (50%) the thirty (30) second rate and fifteen (15) second increments are at sixty-five percent (65%) of the thirty (30) second rate.

Classes of Time Offered by the Station

WRAL-TV offers four (4) classes of immediately preemptible time. Each class has a range of rates with a rate ceiling, except for Class I which does not have a rate ceiling. If a spot is preempted, a make good spot will be rescheduled, if requested, and broadcast within a reasonable period of time.

Class 1- Immediately Preemptible with Notice with 48-hour notice

Class 1 spots are preemptible by higher prices spots within the class up until forty-eight (48) hours before the time of broadcast and have an approximately 76 - 99% chance of clearing, absent unforeseen program changes or technical difficulties.

Class 2 – Immediately Preemptible with Notice with 24-hour notice

Class 2 spots are preemptible up until twenty-four (24) hours before the time of broadcast by higher priced spots within the class and by all Class 1 spots. Class 2 spots have an approximately 51-75% chance of clearing, absent unforeseen program changes or technical difficulties.

Class 3 – Immediately Preemptible with 2-hour Notice

Class 3 spots are preemptible up until two (2) hours before the time of broadcast by higher priced spots within the class and by all Class 1 and Class 2 spots. Class 3 spots have a 26-50% chance of clearing, absent unforeseen program changes or technical difficulties.

Class 4 – Immediately Preemptible with Notice

Class 4 spots are preemptible up until the time of broadcast by higher priced spots within the class and by all Class 1, Class 2 and Class 3 spots. Class 4 spots have a 0-25% chance of clearing, absent unforeseen program changes or technical difficulties.

Preemption Priority for the Same Class of Time

In the event our sale orders for the same class of spots for the same time period should exceed the station's available inventory, the station will, subject to the "reasonable access" requirements for federal candidates, establish a scheduling priority for the announcements on the following basis:

1. Outside the Election Periods during which the LUC is applicable, priority will be given to the schedule of spots purchased by the advertiser that has purchased, in the aggregate, the largest dollar volume of advertising. In the event two or more advertisers have purchased the same dollar volume, the advertiser whose order was purchased first will be afforded priority.
2. During the Election Periods during which the LUC is applicable, political advertisements qualifying for the "lowest unit charge" will be afforded scheduling parity with advertisements purchased by the station's most favored commercial advertisers. In the event the purchase orders of a commercial and political advertiser should be considered equal under these criteria, a political advertiser will be afforded priority. In the event the purchase orders of two or more political advertisers should be considered equal under these criteria, the candidate whose order was placed first will be afforded priority.

Additional Rate and Sales Information

The station's rate card sets forth the specific time periods within which spot time may be purchased. Packages are treated as volume discounts and are considered in calculating the LUC. Rates for other time periods or special programming are available upon request.

The station will supply the current selling level and the LUC for specific time periods, classes of time, and amounts of time upon request.

The station has calculated the predicted LUC for every class of time sold on the station. The LUC in each class may vary on a weekly basis depending upon the price of spots actually broadcast during each week. Candidates may purchase preemptible spots at a particular class' LUC or at a higher class

of time so as to decrease the potential for preemption. Candidates may also decrease the potential for preemption by purchasing a higher class of time.

The station customarily provides a fifteen percent (15%) discount for advertising purchases made by an advertising agency. Political candidates and authorized campaign committees eligible for the LUC and purchasing time during the Election Period without an advertising agency will be extended a fifteen percent (15%) discount.

Make Good Policy

In the event a spot is preempted, the station will notify the candidate and if requested will make good the spot through placement in a comparable time period or periods to deliver an audience comparable to the spot purchased.

Audit Of Rates Charged

At the end of each week, the station will audit the rates for all political time sold during the Election Periods to insure that the rates charged candidates reflect the actual LUC, that is, the lowest rate any advertiser paid for the same class of spot that cleared during the same time period during the given week. Refunds will be issued for any overcharges.

Product Separation

WRAL-TV endeavors to separate commercial advertisers. In cases where limited inventory and high demand dictate, we run competitors in the same commercial break.

Recapture of Spot Time Sold

The station reserves the right to recapture spot time sold to a candidate to meet equal opportunity or reasonable access requirements of the Communications Act of 1934, as amended. If spot time is recaptured by the station, the candidate will be advised as soon as practical and an appropriate refund will be issued.

Log Deadlines

Normal WRAL-TV log deadlines follow below (these deadlines will not apply during a holiday weekend or other selected weekends and will be adjusted accordingly)

<u>Log For:</u>	<u>Order & Payment Deadline:</u>	<u>Copy Deadline:</u>
Monday	2PM Friday (of prior week)	3PM Friday (of prior week)
Tuesday	2PM Monday	3PM Monday
Wednesday	2PM Tuesday	3PM Tuesday
Thursday	2PM Wednesday	3PM Wednesday
Friday	2PM Thursday	3PM Thursday
Saturday	2PM Friday	3PM Friday
Sunday	2PM Friday	3PM Friday

Commercial tapes and copy should be delivered to:

WRAL-TV
2619 Western Boulevard
Raleigh, NC 27606
Attn: Traffic Department

The candidate's order, payment, an air-quality tape, and all appropriate forms must be received by these deadlines in order for spots to be placed on the affected day's log. The station's ability to receive and air spots is subject to unforeseen technical difficulties, satellite delivery and the tape's condition.

On the last six Saturdays immediately before the 2012 general election, the station will accept **copy changes** for advertising scheduled to air Sundays and Mondays from legally qualified candidates for public office or from their authorized campaign organizations to promote their candidacy. Copy changes will not be accepted from political action committees or for non-candidate issue advertising. Qualified candidates or their representatives may submit copy changes from 9AM to 11AM on the following Saturdays:

September 29, 2012
October 6, 2012
October 13, 2012
October 20, 2012
October 27, 2012
November 3, 2012

On the six Saturdays listed above, candidates or their representatives may deliver tapes and copy to the address above or send them electronically to: politicalcopychange@wral.com. Electronic delivery to politicalcopychange@wral.com will not be accepted at any other time. The copy/commercial(s) must be in the station prior to 11AM whether delivered in person or electronically. No exceptions will be made.

No Production; Anti-Discrimination Policy

The station does not produce political advertising. Also, the station does not discriminate in the sale of advertising time and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity.

Further Information

We will provide, upon request, further information about our rates, advertising policies, advertising packages, rotators, and advertising plans. We encourage prospective political time buyers to inquire. It is our desire to furnish all appropriate information to those interested in purchasing political advertising on our station to enable you to make the most cost efficient and effective advertising decisions.

**WRAL-TV Political
Disclosure Statement
Record of Delivery**

**Name of Person Receiving
WRAL-TV Political
Disclosure Statement:**

Signature

Date Supplied:

For (Name of Candidate):

Party:

**Name of WRAL-TV
Sales Representative:**

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

☐ FEDERAL CANDIDATE ☐ STATE/LOCAL CANDIDATE

To Avail Themselves of the Lowest Unit Charge During a Political Window, Federal Candidates Must Sign Candidate Certification below.

Station and Location:	Date:

I, _____,
being/on behalf of: _____, a legally
qualified candidate of the _____ political
party for the office of: _____
in the _____
election to be held on: _____
do hereby request station time as follows:

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

Total Charges:

For programming that "communicates a message relating to any political matter of national importance," list the matters below:

I represent that the check for the above described broadcast time has been furnished by:

and you are authorized to announce the time as paid for by such person or entity.
I represent that this person or entity is either a legally qualified candidate or an authorized committee/organization of the legally qualified candidate.

Name, address and phone number of contact person for candidate or candidate's authorized

committee PLUS name of treasurer (if different):_____

This station has disclosed to me its political advertising policies, including: applicable classes and rates: and discount, promotional and other sales practices (not applicable to federal candidates).

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

To be Signed by Candidate or Authorized Committee

Date Signature

TO BE SIGNED BY STATION REPRESENTATIVE

☐ Accepted ☐ Accepted in Part ☐ Rejected

Signature Printed Name Title

CANDIDATE CERTIFICATION

In Order For Federal Candidates to Receive The Lowest Unit Charge During a Political Window, the Following Certification is Required:

I, _____

(name of federal candidate or authorized committee) hereby certify that the programming to be broadcast (in whole or in part) pursuant to this agreement:

☐ **does** ☐ **does not**

refer to an opposing candidate (check applicable box). I further certify that for the programming that does refer to an opposing candidate:

(check applicable box)

- ☐ the **radio** programming contains a personal audio statement by the candidate that identifies the candidate, the office being sought, and that the candidate has approved the broadcast.
- ☐ the **television** programming contains a clearly identifiable photograph or similar image of the candidate for a duration of at least four seconds, and a simultaneously displayed printed statement identifying the candidate, that the candidate approved the broadcast, and that the candidate and/or the candidate's authorized committee paid for the broadcast. of candidate or authorized committee

signature of candidate or authorized committee

printed name

date

AGREED UPON SCHEDULE

(TO BE FILLED IN ONLY IF STATION DOES NOT ACCEPT ALL OF
CANDIDATE'S REQUEST)

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

TOTAL CHARGES:

AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

Note: Because the FCC requires that the political file contain the actual times the spots air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that specific spots aired.

AGREEMENT FORM FOR NON- CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
------------------------------	--------------

I, _____
do hereby request station time concerning the following issue:

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

Total Charges (to be paid by check or in cash only):

This broadcast time will be used by: _____

Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"

☐ Yes
 ☐ No

For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the office(s) being sought and the date(s) of the election(s) (if applicable):

For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (following page)

I represent that the check for the above described broadcast time has been furnished by: and you are authorized to announce the time as paid for by such person or entity. The entity furnishing the check, if other than an individual person, is:

☐ a corporation; ☐ a committee; ☐ an association; ☐ or other unincorporated group.

The names, offices, and addresses of the chief executive officers, directors, and/or authorized agents/contact persons of the entity are named below (may be attached separately):

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

I agree to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, that may ensue from the broadcast of the above-requested advertisement(s). **For the above-stated broadcast(s), I also agree to prepare a script, transcript, or tape, which will be delivered to the station at least _____ before the time of the scheduled broadcasts.**

TO BE SIGNED BY ISSUE ADVERTISER

Date

Signature

Contact Phone Number

TO BE SIGNED BY STATION REPRESENTATIVE

☐ Accepted ☐ Accepted in Part ☐ Rejected

Signature

Printed Name

--

Title

AGREED UPON SCHEDULE

For All Issue Advertisements That Communicate a Message Relating to Any Political Matter of National Importance

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

Total Charges (to be paid by check or in cash only):

AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

Note: Because the FCC requires that the political file contain the actual times the spots air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that specific spots aired.